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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re OPENWAVE SYSTEMS, INC.)	Master File No. C-06-03468-SI
SHAREHOLDER DERIVATIVE)	
LITIGATION)	
_____)	
This Document Relates To:)	STIPULATION AND [PROPOSED]
)	ORDER EXTENDING TIME TO FILE
ALL ACTIONS)	REPLY BRIEFS
)	
_____)	

1 WHEREAS, on March 9, 2007, the Court entered an Order (the "March 9 Order") setting
2 forth a briefing schedule pursuant to which: (1) Plaintiffs would file their oppositions to nominal
3 defendant Openwave Systems, Inc.'s. ("Openwave") and the Individual Defendants' previously
4 filed motions to dismiss Plaintiffs' Consolidated Verified Shareholder Derivative Complaint; (2)
5 Plaintiffs would file their response to Openwave's motion to stay discovery; and (3) Openwave
6 and the Individual Defendants would file their replies to Plaintiffs' oppositions.

7 WHEREAS, the March 9 Order also set a hearing date of April 27, 2007 for Openwave's
8 and the Individual Defendants' motions to dismiss, Openwave's motion to stay discovery and a
9 Case Management Conference;

10 WHEREAS, pursuant to the March 9 Order, Plaintiffs filed their oppositions to
11 Openwave's and the Individual Defendants' motions to dismiss and Openwave's motion to stay
12 discovery on March 16, 2007;

13 WHEREAS, pursuant to the March 9 Order, Openwave's and the Individual Defendants'
14 replies to the motions are due on March 30, 2007;

15 WHEREAS, Plaintiffs' 61-page consolidated opposition to the motions to dismiss and
16 Plaintiffs' opposition to the motion to stay discovery address and require Openwave and the
17 Individual Defendants to respond to numerous complex legal issues; and

18 WHEREAS, the parties have met and conferred and have agreed, subject to Court
19 approval, to modify the briefing schedule to provide Openwave and the Individual Defendants an
20 additional week to file their replies to the motions.

21 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the
22 parties through their respective counsel of record, subject to Court approval, as follows:

23 1. Openwave's and the Individual Defendants' replies shall be filed on or before
24 April 6, 2007; and
25
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2. Pursuant to the March 9 Order, the hearing on the motions and the case management conference shall remain on calendar for April 27, 2007.

IT IS SO STIPULATED.

DATED: March 28, 2007

LERACH COUGHLIN STOIA GELLER

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s/ Benny C. Goodman III
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Co-Lead Counsel for Plaintiffs

I, Amy S. Park, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Extending Time To File Reply Briefs. In compliance with General Order 45, X.B., I hereby attest that Benny C. Goodman III has concurred in this filing.

1 DATED: March 28, 2007

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12 I, Amy S. Park, am the ECF user whose ID and password are being used to file this
13 Stipulation and [Proposed] Order Extending Time To File Reply Briefs. In compliance with
14 General Order 45, X.B., I hereby attest that Shirish Gupta has concurred in this filing.

15 DATED: March 28, 2007

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and [Proposed] Order Extending Time To File Reply Briefs. In compliance with General Order
45, X.B., I hereby attest that Paul Collins has concurred in this filing.

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____



THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE

1 I, Amy S. Park, am the ECF User whose identification and password are being used to file
2 the attached STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO FILE REPLY
3 BRIEFS. In compliance with General Order 45.X.B, I hereby attest that each of the counsel
4 executing the STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO FILE
5 REPLY BRIEFS has concurred in this filing.

6
7 Dated: March 28, 2007

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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9 By: /s/ Amy S. Park
AMY S. PARK

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of March, 2007, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic service. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system as indicated on the Notice of Electronic Filing or by mail as required by the Court's CM/ECF rules. Parties may access this filing through the Court's CM/ECF System.

/s/ Amy S. Park
Amy S. Park